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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

EDUARDO I.T., EDWIN E.I.I., Ignacio P.G.,  
Leonel Y.P.G., a minor child, Benjamin J.R.,  
and William A.J.M.

Plaintiffs,

vs.

UNITED STATES OF AMERICA

Defendant.

Case No. 4:22-cv-05333-DMR

**STIPULATION FOR REMOVAL OF  
INCORRECTLY FILED DOCUMENT  
AND ~~[PROPOSED]~~ ORDER**

Honorable Donna M. Ryu  
Trial Date: March 5, 2025  
CMC Date: March 6, 2024

1 Plaintiffs Eduardo I.T., Edwin E.I.I., Ignacio P.G., Leonel Y.P.G., Benjamin J.R., and William  
2 A.J.M. ("Plaintiffs") and Defendant United States of America ("Defendant") (collectively, the  
3 "Parties"), by and through their respective counsel, hereby stipulate and agree, pursuant to Civil Local  
4 Rule 7-12 and subject to the Court's approval, as follows:

5 WHEREAS, on December 9, 2022, the Court granted Plaintiffs' Administrative Motion to  
6 Proceed Under Pseudonyms (Dkt. No. 20).

7 WHEREAS, the originally-filed Complaint (Dkt. No. 1) contains three instances of one of the  
8 plaintiffs' true names.

9 WHEREAS, Plaintiffs filed a corrected Complaint (Dkt. No. 68) on December 7, 2023 solely for  
10 the purpose of correcting the aforementioned three instances.

11 WHEREAS, the Parties have met and conferred, and Defendant, at Plaintiffs' request, agreed to  
12 stipulate to Plaintiffs' removal of the originally-filed Complaint (Dkt. No. 1) from the docket such that  
13 (1) Plaintiffs' corrected Complaint would act as the operative complaint in the case and (2) Defendant's  
14 original answer (Dkt. No. 35) would continue to act as the operative answer in the case.

15 NOW THEREFORE, the Parties stipulate that the originally-filed Complaint (Dkt. No. 1) be  
16 removed from the docket and Defendant's original answer (Dkt. No. 35) will continue to act as the  
17 operative answer in the case.

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1 Dated: December 8, 2023

2 Respectfully submitted,

3 ISMAIL J. RAMSEY  
4 United States Attorney

5 /s/ Kenneth Brakebill  
6 Kenneth Brakebill  
7 Kelsey J. Helland  
8 Assistant United States Attorneys

9 *Counsel for Defendant*

10 PILLSBURY WINTHROP SHAW PITTMAN LLP

11 /s/ Dustin Chase-Woods  
12 Dustin Chase-Woods  
13 Blaine I. Green

14 LAWYERS' COMMITTEE FOR CIVIL RIGHTS  
15 OF THE SAN FRANCISCO BAY AREA

16 Rachel Sheridan  
17 Victoria Petty

18 *Attorneys for Plaintiffs*

19 ATTESTATION

20 I, Dustin Chase-Woods, attest that all signatories listed, and on whose behalf the filing is  
21 submitted, concur in the filing's content and have authorized the filing.

22 Dated: December 8, 2023

23 /s/ Dustin Chase-Woods  
24 Dustin Chase-Woods

~~[PROPOSED]~~ ORDER

Pursuant to Stipulation, and good cause appearing, IT IS SO ORDERED that the originally-filed Complaint (Dkt. No. 1) be removed from the docket and Defendant's original answer (Dkt. No. 35) will continue to act as the operative answer in the case.

Dated: 12/18/2023

  
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HONORABLE DONNA M. RYU  
Chief Magistrate Judge, U.S. Magistrate Court